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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY**

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ALLISON DAWN BLIXT and  
L. Z.-B.,

Plaintiffs,

v.

The UNITED STATES  
DEPARTMENT OF STATE and  
MICHAEL R. POMPEO in his  
official capacity as Secretary, U.S.  
Department of State,

Defendants.

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: Civ. No. 2:20-cv-02102-KM-JBC

: Hon. Kevin McNulty

: **NOTICE OF MOTION AND**  
: **MOTION FOR LEAVE TO**  
: **AMEND THE COMPLAINT**  
: **PURSUANT TO FEDERAL**  
: **RULE OF CIVIL**  
: **PROCEDURE 15(a)(2)**

: Motion Date: May 18, 2020

PLEASE TAKE NOTICE that, on April 13, 2020, Sullivan & Cromwell LLP, counsel for Plaintiffs, Allison Dawn Blixt and L. Z.-B., by and through his court-appointed guardian *ad litem*, Stefania Zaccari, (together, “Plaintiffs”), will move before the Honorable Kevin McNulty, United States District Judge, District of New Jersey, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, pursuant to Federal Rule of Civil Procedure 15(a)(2) and the Court’s Local Rule 15.1, for an Order granting leave to amend the Complaint (the “Motion”), and granting such other relief as the Court deems just and proper. Defendants, the United States Department of State and the Honorable Michael R. Pompeo, in his official capacity as Secretary of State, do not oppose this Motion.

PLEASE TAKE FURTHER NOTICE that, in support of the Motion, Plaintiffs will rely upon the accompanying *Memorandum of Points and Authorities in Support of Motion for Leave to Amend the Complaint Pursuant to Federal Rule of Civil Procedure 15(a)(2)* (Exhibit (“Ex.”) A).

PLEASE TAKE FURTHER NOTICE that the *[Proposed] First Amended Complaint* (Ex. B) and a redline of the proposed amended complaint identifying the proposed changes, from which L. Z.-B.’s and his minor brother’s full names have been redacted to preserve the privacy of their identities, (Ex. C) are submitted herewith for the Court’s consideration.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is also submitted herewith for the Court's consideration (Ex. D).

Dated: April 13, 2020

Respectfully submitted,

By: /s/ Mark A. Makar

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Civ. No. 2:20-cv-02102-KM-JBC

Hon. Kevin McNulty

I, Mark A. Makar, of full age, certify as follows:

1. On April 13, 2020, I served the foregoing Notice of Motion and Motion for Leave to Amend the Complaint Pursuant to Federal Rule of Civil Procedure 15(a)(2) on all counsel of record in the above-captioned action via the Court's ECF system.

Dated: April 13, 2020

Respectfully submitted,

By: /s/ Mark A. Makar

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